

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAVID PELCHAT,)	
)	
Plaintiff,)	C.A. No. 1:19-cv-10209-RGS
)	
v.)	
)	
TEREX SOUTH DAKOTA, INC., and)	
J.J. KANE AUCTIONEERS, INC.,)	
)	
Defendants,)	
)	

STIPULATION FOR PROTECTIVE ORDER
CONCERNING CONFIDENTIAL DOCUMENTS

The parties hereby stipulate and agree that certain documents produced during discovery in the case contain confidential, proprietary business information the disclosure of which for purposes not associated with this litigation could be harmful to the parties. Therefore, the parties hereby stipulate and agree, and the court orders, the following terms govern the confidential documents produced during discovery in this case.

1. Documents shall be designated confidential by being stamped with the word "CONFIDENTIAL" on the document.
2. Documents designated confidential shall be used for purposes of this litigation only and shall not be disclosed or provided to persons or entities in competition with any of the parties, or to any other persons other than the parties, their lawyers and law firm personnel, and consulting experts.
3. At the conclusion of the litigation, the confidential documents and all copies shall be returned to counsel for the respective parties.

4. Consulting experts who are provided with confidential documents shall be made aware of this protective order and sign an acknowledgement of having reviewed it and agreeing to abide by its terms.
5. The protections of non-disclosure for confidential documents shall not be extinguished and shall remain in effect in the event that the confidential documents are shown to witnesses during depositions, whether they are marked as exhibits or not.
6. If any confidential documents are identified as exhibits to motions, the parties agree that the moving party is obligated to file a motion to seal the documents and to permit *in camera* review of the documents by the court. Similarly, the parties agree that any party intending to introduce confidential documents as exhibits at trial shall be required to file a motion to seal the documents before they are introduced into evidence.

HEREBY ORDERED THIS 19th DAY OF July, 2019



United States District Judge